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5
6 Attorney for Plaintiff

7 **UNITED STATES DISTRICT COURT**
8 **DISTRICT OF NEVADA**

9 MARK CARLO)
10 Plaintiff,)
11 vs.) No.
12)
13 BANK OF AMERICA,)
14 NATIONAL ASSOCIATION)
15 Defendant.)
16 _____

17 **COMPLAINT**

18 **JURISDICTION**

19 1. The jurisdiction of this Court attains pursuant to the FCRA, 15 U.S.C. Section
20 1681(p), and the doctrine of supplemental jurisdiction. Venue lies in the Southern Division of
21 the Judicial District of Nevada as Plaintiffs' claims arose from acts of the Defendant perpetrated
22 therein.

23 **PRELIMINARY STATEMENT**

24 2. The Plaintiff brings this action for damages based upon Defendant's violations of
25 the Fair Credit Reporting Act, 15 U.S.C § 1681 *et seq.* (hereinafter referred to as "FCRA").

26 3. Plaintiff is a natural person and is a resident and citizen of the State of Nevada
27 and of the United States. Plaintiff is a "consumer" as defined by § 1681a(c) of the FCRA.

4. Defendant Bank of America, National Association, is a furnisher of information as contemplated by FCRA § 1681s-2(a) & (b), who regularly and in the ordinary course of business furnishes information to one or more consumer reporting agencies about consumer transactions or experiences with any consumer.

FACTUAL ALLEGATIONS

5. Plaintiff's creditworthiness has been repeatedly compromised by the acts, obduracy and general indifference of Defendant.

6. Plaintiff has serially disputed Defendant's account.

7. Despite both Defendant's misreporting and Plaintiff's disputes, Defendant has failed to notate the account *as disputed* in violation of FCRA § 1681s-2(b)(1)(C), (D) and (E).

8. Plaintiff is a fraud victim.

9. On June 25, 2020 Plaintiff disputed Defendant's reporting (Exhibit 1).

10. Plaintiff explicitly advised Defendant he was betrayed by his deceased spouse (Exhibit 1).

11. Exhibit 1 reflects Plaintiff's summary of events leading to the serial frauds.

12. Plaintiff provided his former spouse's Death Certificate (Exhibit 1).

13. At the same time, Plaintiff likewise disputed a similarly fraudulent \$6,800 AMEX account (Exhibit 1).

14. On July 5, 2020 AMEX contritely contacted Plaintiff (Exhibit 2).

15. In Exhibit 2 AMEX apologized agreeing to delete its \$6,800 account.

16. The fraudulent AMEX account has, in fact, been deleted.

17. Citibank has also agreed to delete its fraudulent account.

18. On July 18, 2020 Defendant “verified” its fraudulent account (Exhibit 3).

19. As reflected in the Death Certificate, Rosemarie Carlo, 55, died of Metastatic Cancer September 2, 2019 (Exhibit 1).

20. Plaintiff's father, David Carlo, died from Pancreatic Cancer the following month.

21. Plaintiff's son, Michael, 30, is autistic, retarded and has cerebral palsy.

1 22. Michael requires full time care which is now exclusively provided by Plaintiff.

2 23. Subsequent to the death of both Rosemarie and David, Plaintiff and Michael went
3 to Defendant's local branch to remove Rosemarie from Michael's SSI account.

4 24. Defendant then *coerced* Plaintiff into making a *\$10,800 cash payment* that very
5 same day.

6 25. The account is now fully paid despite the fraud.

7 26. Notwithstanding, Defendant fails to report its account as either *paid* or with a zero
8 (0) balance (Exhibit 3).

9 27. Exhibit 3 reflects Defendant failed to note its account as disputed.

10 28. Defendant's representatives threatened and otherwise intimidated Plaintiff into
11 paying.

12 29. Defendant's representatives took full advantage of Plaintiff.

13 30. Defendant's representatives capitalized on Plaintiff's fears and vulnerability.

14 31. Defendant failed to reasonably reinvestigate Plaintiff's dispute.

15 32. On July 14, 2020 and October 15, 2020 Defendant again "verified" its fraudulent
16 account (Exhibits 4 and 5).

17 33. Exhibits 4 and 5 reflect Defendant failed to note its account as disputed.

18 34. Defendant's failure to note Plaintiff's dispute is in explicit violation of FCRA
19 § 1681s-2(b)(1)(C), (D) and (E). Gorman v. Wolpoff & Abramson, LLP, 584 F.3d 1147, 1162-
20 64 (9th Cir. 2009).

21 35. Plaintiff has no way of knowing, short of discovery, precisely how Plaintiff's
22 dispute was conveyed to Defendant, *but is entitled to a presumption it did so*. Shulick v.
23 Experian, 2011 WL 4346335 (E.D.Pa.), Fishback v. HSBC Retail Services Inc., 944 F.Supp.2d
24 1098, 1113 (D. New Mexico 2013).

25 36. In its indifference, Defendant ignored basic credit reporting industry standards.
26 Cassara v. DAC Services, Inc., 276 F.3d 1210, 1225 (10th Cir. 2002).

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37. In failing to correct Plaintiff's tradeline, Defendant continued to report *patently inaccurate* information in violation of the FCRA. Drew v. Equifax Information Services, LLC, 690 F.3d 1100, 1108 (9th Cir. 2012).

38. In failing to appropriately revise Plaintiff's tradeline, Defendant provided *misleading* information which likewise violated the FCRA, Drew v. Equifax Information Services, LLC, 690 F.3d 1100, 1108 (9th Cir. 2012).

39. Defendant was precluded from making any report either patently wrong or “missing crucial data” or otherwise misleading. Kuns v. Ocwen Loan Servicing, LLC, 611 Fed.Appx. 398 (U.S. Ct. of Appeals, Ninth Circuit 2015).

40. Defendant violated FCRA § 1681s-2(b)(1)(E)(i) in its failure to provide additional information explicating the status of Plaintiff's account. Bush v. Roundpoint Mortg. Servicing Corp., 122 F.Supp.3d 1347, 1351 (2015).

41. Plaintiff has suffered meaningful emotional distress including, but not limited to, excessive worry, frustration, sleeplessness, anger, humiliation, embarrassment, chagrin and other mental anguish as a direct result of Defendant's conduct. McCollough v. Johnson, Rodenburg & Lauinger, LLC, 637 F.3d 939, 957 (9th Cir. 2011).

STATEMENT OF CLAIM AS AGAINST DEFENDANT

42. In the entire course of its action, Defendant willfully and/or negligently violated the provisions of the FCRA in the following respects:

a. By willfully and/or negligently failing to comport with FCRA § 1681s-2(b).

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PRAYER FOR RELIEF

THEREFORE, Plaintiff prays that the court grant the following relief as against

Defendant:

- a) actual damages;
- b) punitive damages;
- c) attorney's fees; and
- d) costs.

MITCHELL D. GLINER, ESQ.
Nevada Bar #003419
3017 W. Charleston Blvd. #95
Las Vegas, Nevada 89102
Attorney for Plaintiff

June 25, 2020

CERTIFIED MAIL

Experian Information Solutions, Inc.
P.O. Box 4500
Allen, TX 75013

Re: **Carlo, Mark J. / Dispute**

Dear Sir,

This letter is a Dispute. I have attached an excerpt from my recent credit profile. I have also enclosed copies of both my Social Security Card and Driver License. My attorney helped me prepare this letter to ensure you have all of the information you need to appropriately address my concerns. I have personally reviewed, approved and signed this letter.

I provide my personal information: Mark J. Carlo; Spouse: Deceased; current address: .. Henderson, NV ; SSN ; 4350; date of birth: , 1961.

The noted AMEX, Citibank and BOA accounts are fraudulent. Please delete all three (3). They are the only negative accounts on my otherwise excellent credit report. My late wife, Rosemarie Carlo, established these accounts without my knowledge. I never once used any of these cards. Rosemarie, 55, died 9/2/19. I've attached a copy of her Death Certificate. Approx. two (2) weeks after Rosie's death her employer provided me a folder containing numerous credit card statements, invoices and other financial documents (which she'd obviously hid from me). The overwhelming difficulty in dealing with the death of my wife of thirty (30) years and the burden of solely caring for our surviving children was greatly compounded by this terrible fraud and betrayal. Please DO NOT verify any of these three (3) accounts without first obtaining an application reflecting my signature-none exists!

I note I have been in touch with Amex, Citibank and BOA. None of the three (3) had either my cell number nor email address on file.

Thank you in advance for your anticipated courtesy.

Very truly yours,



Mark J. Carlo

Enclosures

EXHIBIT 1

PO Box 9701
Allen, TX 75013



0003108 02 M3 0.416 **AUJO T802100.89044-025761 -C02-P03111-1
Mark Carlo



Mark Carlo

Your Credit Report

Report # 4141-8136-53 for 04/24/20

In response to your recent request, we are sending you this credit report. Before contacting us, please review this report carefully. If you disagree with an item, you may dispute it. We will process disputes generally by sending your dispute to the furnisher of the information or to the vendor who collected the information from a public record.

The fastest and easiest way to dispute most information that you disagree with is by creating your member login at experian.com/disputes. Keep track of any changes and dispute notifications online. You can also call with disputes or questions at 833 210 4610, M - F 9am - 5pm in your time zone, or submit your dispute in writing by mailing to Experian, NCAC, P.O. Box 2002, Allen TX 75013. Be advised that written information or documents you provide with respect to your disputes may be shared with all creditors with which you are disputing.

Payment History Legend

Current	Account 150 days past due	Voluntarily surrendered	Defaulted on contract
Account 30 days past due	Account 180 days past due	Repossession	Collection
Account 60 days past due	Creditor received deed	Paid by creditor	Charge off
Account 90 days past due	Foreclosure proceedings started	Insurance claim	Closed
Account 120 days past due	Foreclosed	Claim filed with government	ND No data for this time period

If your creditor reported your account balances to us, we list them in this section as additional information about your account.

Medical Information

By law, we cannot disclose certain medical information (relating to physical, mental, or behavioral health or condition). Although we do not generally collect such information, it could appear in the name of a data furnisher (i.e. "Cancer Center") that reports your payment history to us. If so, those names display on your report, but on reports to others, they display only as MEDICAL PAYMENT DATA. Consumer statements included on your report at your request that contain medical information are disclosed to others.

Your accounts that may be considered negative

payments, accounts that have been charged off or sent to collection, and bankruptcies. It also may contain items that are not necessarily negative, but that a potential creditor might want to review more closely, such as an account that has been settled or transferred. This information is generally removed seven years from the initial missed payment that led to the delinquency. Missed payments may remain on the credit report for up to seven years. Chapters 7, 11 and 12 bankruptcies may remain on the credit report for up to 10 years. Transferred accounts that have not been past due remain up to 10 years after the date the account was transferred.

Credit items

AMERICAN EXPRESS Partial Acct# 3499028240935563 PO BOX 9391537411 FORT PASEO TX 79998 (800) 874-2717

Mark Carlo | Report # 4141-8136-53 for 04/24/20



Account History • (AB = Account Balance, DPR = Date Payment Received, SPA = Scheduled Payment Amount, AAP = Actual Amount Paid)

	Mar20	Feb20	Jan20	Dec19	Nov19	Oct19	Sep19	Aug19	Jul19	Jun19	May19	Apr19	Mar19	Feb19	Jan19
AB (\$)	6,631	6,500	6,447	6,329	6,216	6,216	6,024	6,668	7,211	7,050	6,551	6,619	6,640	7,266	7,217
DPR	ND														
SPA (\$)	100	169	182	178	62	222	222	178	230	222	204	208	164	228	224
AAP (\$)	ND														
	Dec18	Nov18	Oct18	Sep18	Aug18	Jul18	Jun18	May18	Apr18						
AB (\$)	7,071	6,003	7,041	7,102	7,162	7,229	7,003	7,053	6,925						
DPR	ND														
SPA (\$)	212	161	209	213	216	ND	ND	ND	ND						
AAP (\$)	ND														

Between Nov 2019 And Mar 2020, your credit limit/high balance was \$5,400. Between Apr 2018 and Oct 2019, your credit limit/high balance was \$7,000.

BETWEEN JULY 2017 AND JULY 2020, YOUR CREDIT LIMIT ON THIS CARD WAS \$6,400
BETWEEN JULY 2017 AND OCT 2017, YOUR CREDIT LIMIT

Account History: * (AB = Account Balance, DPR = Date Payment Received, SPA = Scheduled Payment Amount, AAP = Actual Amount Paid)

Account History - (AB = Account Balance, DR = Date Payment Received, SPA = Scheduled Payment Amount, PAI = Actual Amount Paid)

Published on 01/09/2018 and last updated on 10/01/2019. www.espn.com/uk/football/1112/2018/1112/2019

Between Oct 2019 and Nov 2019, your credit utilization balance was \$11,300
Visit [Credit Karma](https://www.creditkarma.com/1233511) to learn how to improve your credit score.

Account History * (AB = Account Balance, DPR = Date Payment Received, SPA = Scheduled Payment Amount, AAP = Actual Amount Paid)

Account History (AB = Account Balance, DR = Debit / Payment Received, CR = Credit / Payment Amount, FA = Actual Amount Paid)														
Mar20	Feb20	Jan20	Dec19	Nov19	Oct19	Sep19	Aug19	Jul19	Jun19	May19	Apr19	Mar19	Feb19	Jan19
AB (\$)	3,770	3,770	3,770	3,770	3,770	3,770	3,770	3,765	3,765	3,820	3,820	3,845	3,845	3,845
DPR	Jul12	Jun05	Jun05	Mar20	Mar20	Dec13	Dec13	Dec13						
SPA (\$)	ND													
AAP (\$)	ND													
	Dec18	Nov18	Oct18	Sep18	Aug18	Jul18	Jun18	May18	Apr18					
AB (\$)	3,760	3,765	3,692	3,600	3,505	3,410	3,323	3,234	2,990					
DPR	Dec13	Apr20												

Mark Carlo | Report # 4141-8136-53 for 04/24/20

SPA (\$)	631	735	619	531	435	332	245	111	109
AAP (\$)	ND								

Between Apr 2018 and Mar 2020, your credit limit/high balance was \$3,200

Your accounts in good standing These items may stay on your credit report for as long as they are open. Once an account is closed or paid off it may continue to appear on your report for up to ten years. Each of the items in this section has a positive payment history, meaning that no delinquencies or derogatory statuses are reported in the displayable payment history.

AMERICAN EXPRESS Partial Acct # 3499917397883463 PO BOX 961537 EL PASO TX 79998 (800) 874-2171

Date opened	Responsibility	Monthly payment	Recent balance
Dec 2009	Individual	Not reported	\$0 as of Jul 2016
Address ID #	First reported	Credit limit or original amount	Status
0734232805	Jun 2011	\$3,200	Closed/Never late.
Type	Terms	High balance	This account is scheduled to
Credit card	Not reported	\$2,910	continue on record until Jul 2026.
			Comment:
			Purchased by another lender.
			Date of Status
			Jul 2016

KOHLS/CAPONE Partial Acct # 639305045437 PO BOX 3115 MILWAUKEE WI 53201 (800) 564-5740

Date opened	Responsibility	Monthly payment	Recent balance
Aug 2006	Individual	Not reported	Not reported
Address ID #	First reported	Credit limit or original amount	Status
0740587174	Aug 2006	\$500	Paid, Closed/Never late.
Type	Terms	High balance	This account is scheduled to
Charge Card	Not reported	\$499	continue on record until Mar 2026.
			Date of Status
			Mar 2016

R.C. WILLEY HOME FURNISHINGS Partial Acct # 2132023019300 W SALT LAKE CITY UT 84115 (801) 461-3940

Date opened	Responsibility	Monthly payment	Recent balance
Aug 2007	Joint with	\$176	\$0 /paid as of Apr 2013
Address ID #	CARLO ROGEMARIE	Credit limit or original amount	Status
0720417998	First reported	\$3,500	Inactive/Never late.
Type	Sep 2007	High balance	This account is scheduled to
Charge Card	Terms	\$3,517	continue on record until Apr 2023.
	Not reported		Date of Status
			Apr 2013

SYNCH/AC PENNEY Partial Acct # 600289356150 PO BOX 96507 ORLANDO FL 32896 (860) 542-0800

Date opened	Responsibility	Monthly payment	Recent balance
Sep 2005	Individual	Not reported	Not reported
Address ID #	First reported	Credit limit or original amount	Status
0734232805	Sep 2005	\$500	Paid, Closed/Never late.
Type	Terms	High balance	This account is scheduled to
Charge Card	Not reported	\$602	continue on record until Feb 2028.
			Comment:
			Account closed at credit grantor's
			request.
			Date of Status
			Feb 2018

SYNCH/SAMS CLUB Partial Acct # 604599221588 PO BOX 96505 ORLANDO FL 32896 (800) 963-9171

Date opened	Responsibility	Monthly payment	Recent balance
Nov 2003	Individual	Not reported	Not reported
Address ID #	First reported	Credit limit or original amount	Status
0740587174	Oct 2003	Not reported	Paid, Closed/Never late.
Type	Terms	High balance	This account is scheduled to
Charge Card	Not reported	\$1,488	continue on record until Jul 2025.
			Date of Status
			Jul 2015

SYNCH/UX COS Partial Acct # 604585201483 PO BOX 96505 ORLANDO FL 32896 (877) 690-3150

7100-00-0003169-0002-0070060



STATE OF NEVADA CERTIFICATION OF VITAL RECORD												
DEPARTMENT OF HEALTH AND HUMAN SERVICES DIVISION OF PUBLIC AND BEHAVIORAL HEALTH VITAL STATISTICS CERTIFICATE OF DEATH												
CASE FILE NO. 4101983						2019017672 STATE FILE NUMBER						
TYPE OR PRINT IN PERMANENT BLACK INK	1a. DECEASED-NAME (FIRST,MIDDLE, LAST, SUFFIX)						2 DATE OF DEATH (Mo/Day/Year)		3a. COUNTY OF DEATH			
	Rosemarie Elizabeth			CARLO			September 02, 2019		Clark			
DECEDENT	3b. CITY, TOWN, OR LOCATION OF DEATH		3c. HOSPITAL OR OTHER INSTITUTION (Name if not either, give Street or Box # if Hosp. or Inst. indicate DOA, OP/EP/Arr. 4- Inpatient/Outpatient)				3d. SEX					
	Las Vegas		Nathan Adelson Hospice				Female					
# DEATH OCCURRED IN INSTITUTION SEE HANDBOOK REGARDING COMPLETION OF RESCINCE ITEMS	3e. RACE (Specify)		3f. Hispanic Origin? Specify No - Non-Hispanic		3g. AGE-Last birth day (Years)		3h. UNDER 1 YEAR MOS DAYS HOURS MINS		3i. DATE OF BIRTH (Mo/Day/Yr.)			
	White		No - Non-Hispanic		55		405 000 000 000		November 13, 1963			
PARENTS	9a. STATE OF BIRTH (If not US/CA, name country)		9b. CITIZEN OF WHAT COUNTRY		10 EDUCATION		11 MARITAL STATUS (Specify)		12 SURVIVING SPOUSE'S NAME (Last, First, Middle Initial)			
	Ohio		United States		16		Married		Mark CARLO			
DISPOSITION	13 SOCIAL SECURITY NUMBER		14a. USUAL OCCUPATION (Give Kind of Work Done During Most of Paralegal)				14c. KIND OF BUSINESS OR INDUSTRY Law-City Planning				Ever in US Armed Forces? No	
	X											
TRADE CALL	15a. RESIDENCE - STATE		15b. COUNTY		15c. CITY, TOWN OR LOCATION		15d. STREET AND NUMBER		15e. INSIDE CITY LIMITS County? Yes or No			
	Nevada		Clark		Las Vegas				X			
CERTIFIER	16. FATHER/PARENT - NAME (First Middle Last, Suffix)						17. MOTHER/PARENT - NAME (First Middle Last, Suffix)					
	Anthony NARO						Elizabeth GRESKO					
REGISTRAR	18a. INFORMANT - NAME (Type of Print)		18b. MAILING ADDRESS (Street or P.R.F.O. No, City or Town, State, Zip)									
	Mark CARLO						X					
CAUSE OF DEATH	19a. BURIAL, CREMATION, REMOVAL, OTHER (Specify)		19b. CEMETERY OR CREMATORIUM - NAME				19c. LOCATION (City or Town, State)					
	Cremation		La Paloma Funeral Services				Las Vegas Nevada 89122					
CONDITIONS IF ANY WHICH GAVE RISE TO IMMEDIATE CAUSE STATING THE UNDERLYING CAUSE LAST	20a. FUNERAL DIRECTOR - SIGNATURE (Or Person Acting as Such)		20b. FUNERAL DIRECTOR LICENSE NUMBER		20c. NAME AND ADDRESS OF FACILITY							
	RAYMOND L GIDDENS Jr SIGNATURE AUTHENTICATED		FD923		Giddens Memorial Chapel 3475 W Post Rd Las Vegas NV 89118							
TRADE CALL - NAME AND ADDRESS												
CERTIFIER	21a. To the best of my knowledge, death occurred at the time, date and place and due to the cause(s) stated (Signature & Title)		22a. On the basis of examination and/or investigation, in my opinion death occurred at the time, date and place and due to the cause(s) stated (Signature & Title)									
	SIGNATURE AUTHENTICATED KANG CHOI DO		SIGNATURE AUTHENTICATED KANG CHOI DO									
REGISTRAR	21b. DATE SIGNED (Mo/Day/Yr)		21c. HOUR OF DEATH		22b. DATE SIGNED (Mo/Day/Yr)		22c. HOUR OF DEATH					
	September 08, 2019		14:52									
CAUSE OF DEATH	21d. NAME OF ATTENDING PHYSICIAN IF OTHER THAN CERTIFIER (Type or Print)		22d. PRONOUNCED DEAD (Mo/Day/Yr)				23a. NAME AND ADDRESS OF CERTIFIER (PHYSICIAN, ATTENDING PHYSICIAN, MEDICAL EXAMINER, OR CORONER) (Type or Print)					
	Kang Choi DO 2160 N Rainbow Las Vegas, NV 89108		22d. PRONOUNCED DEAD AT (Hour)				23b. LICENSE NUMBER DO2569					
CONDITIONS IF ANY WHICH GAVE RISE TO IMMEDIATE CAUSE STATING THE UNDERLYING CAUSE LAST	24a. REGISTRAR (Signature)		24b. DATE RECEIVED BY REGISTRAR (Mo/Day/Yr)		24c. DEATH DUE TO COMMUNICABLE DISEASE YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>							
	NANCY BARRY SIGNATURE AUTHENTICATED		September 09, 2019									
25. IMMEDIATE CAUSE (ENTER ONLY ONE CAUSE PER LINE FOR (a), (b), AND (c))												
PART I												
(a) Due to, or as a consequence of												
(b) Due to, or as a consequence of												
(c) Due to, or as a consequence of												
(d) Due to, or as a consequence of												
PART II - OTHER SIGNIFICANT CONDITIONS-Conditions contributing to death but not resulting in the underlying cause given in Part I												
26a. ACC. SUICIDE, HOMICIDE, UNDET. OR PENDING INVEST. (Specify)		26b. DATE OF INJURY (Mo/Day/Yr)		26c. HOUR OF INJURY		26d. DESCRIBE HOW INJURY OCCURRED		26e. AUTOPSY (Specify)		26f. IT WAS CASE REFERRED TO CORONER Specify Yes or No		
								No		No		
26g. INJURY AT WORK (Specify Yes or No)		26h. PLACE OF INJURY: At home, farm, street, factory, office building, etc. (Specify)		26i. LOCATION		26j. STREET OR R.F.D. NO.		26k. CITY OR TOWN		26l. STATE		

***CERTIFIED TO BE A TRUE AND CORRECT COPY OF THE DOCUMENT ON FILE WITH THE REGISTRAR OF VITAL STATISTICS, STATE OF NEVADA.** This copy was issued by the Southern Nevada Health District from State certified documents authorized by the State Board of Health pursuant to NRS 440.175.

1000

SEP 19 2019

Registered with the Statute
B.C.

This Copy not valid unless prepared on engraved border with logo, seal and signature of Registrar.
SOUTHERN NEVADA HEALTH DISTRICT • P.O. Box 3902 • Las Vegas, NV 89127 • 702-759-1010 • Tax ID # 84-015-573

ANY ALTERATION OR ERASURE MAKES THIS CERTIFICATE VOID.



**American Express
Fraud Operations
P.O. Box 981541
El Paso, TX 79998**

www.americanexpress.com

July 05, 2020

MB 01 005151 18758 E 18 A

Mark J Carlo

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Account Ending In: 61006

Dear Mark J Carlo,

Thank you for bringing the fraudulent use of your identity to our attention. We have taken the necessary steps to close this account and remove any derogatory information regarding this American Express account from your credit report. No further action on your part is required.

二二

Please note it may take up to 90 days for your credit information to be updated. If in the future you discover a credit reporting agency has not corrected your credit history, please provide the agency with a copy of this letter. In the meantime, you may show this letter to any potential creditor as verification of the accurate reporting of the account.

We apologize for any inconvenience and concern this situation has caused you. We take the fraudulent use of credit cards very seriously and sincerely hope we have resolved this case to your satisfaction.

If we may be of further assistance, please contact us at 1-800-678-0745 and ask for the Fraud Department.

Sincerely,

Global Fraud Protection Services

Dispute Reference Number: OUI8137



The Issuer of this Product is American Express National Bank.

EXHIBIT 2

3M39 IND 1010 FROP 1115427A QLJ18137 TRMUNER20019001 N N

PO Box 9701
Allen, TX 75013



0005165 01 SP 0.500 **SNGLP HS 1 7172
MARK JOHN CARLO

COI-P051704

HENDERSON NV



MARK JOHN CARLO

Dispute Results

Report # 2135-8064-76 for 07/18/20

Our reinvestigation of the dispute(s) and/or other request(s) you recently submitted is now complete. If an item you disputed is not in the list of results below, it was either not appearing in your credit file or it already reflected the requested status at the time of our reinvestigation.

In response to your recent request, we are sending you this credit report. Before contacting us, please review this report carefully. If you disagree with an item, you may dispute it. We will process disputes generally by sending your dispute to the furnisher of the information or to the vendor who collected the information from a public record. If we were able to make changes to your credit report based on information you provided, or if you requested the addition of a statement, we have done so. Otherwise, we have contacted the company reporting the information you disputed, supplied them all relevant information and any documents you gave us with your dispute, and instructed them to: review all information we provide them about your dispute; verify the accuracy of the information; provide us a response to your dispute; and update their records and systems as necessary.

How to read your results

Deleted - This item was removed from your credit report. **Remains** - The company that reported the information has certified to Experian that the information is accurate. This item was not changed as a result of our processing of your dispute. **Updated** (Your results will indicate which one of the following applies.) – a) The information you disputed has been updated. Please review your report for the details. b) The item you disputed has been updated, which may include an update to the disputed information. Please review your report for the details. c) The information you disputed has been verified as accurate, however, information unrelated to your dispute has been updated. Please review your report for the details. d) Information on this item has been updated. Please review your report for the details. **Processed** - This item was either updated or deleted; Please review your report for the details.

Here are your results

Credit items

AMEX 3499917197888463 Outcome: **Deleted** - This item was removed from your credit report. Please review your report for the details.

BANK OF AMERICA 440066291605.... Outcome: **Updated** - The information you disputed has been verified as accurate; however, information unrelated to your dispute has been updated. Please review your report for the details.

CITI 410039017365.... Outcome: **Remains** - The company that reported the information has certified to Experian that the information is accurate. This item was not changed as a result of our processing of your dispute. Please review your report for the details.

Before dispute

7172-01-00-0005165-0001-0011581

EXHIBIT 3

MARK JOHN CARLO | Report # 2135-8064-76 for 07/18/20

BANK OF AMERICA Partial Acct # 440068291605 PO BOX 982238 EL PASO TX 79998 (800) 421-2110

Date opened	First reported	Recent balance	Payment history											
			Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Jan 2006	Oct 2017	Not reported												
Address ID #	Terms	Status												
0740587174	Not reported	Paid, Closed.												
Type	Monthly payment	Comment:												
Credit card	Not reported	Account closed at												
Responsibility	Credit limit or original amount	credit grantor's request.												
Individual	\$11,300	This item remained unchanged from our processing of your dispute in Apr 2020.												
	High balance	\$11,368												
	Date of Status	Dec 2019												



Account History * (AB = Account Balance, DPR = Date Payment Received, SPA = Scheduled Payment Amount, AAP = Actual Amount Paid)

Nov19	Oct19
AB (\$)	11 10,006
DPR	Nov14 Oct21
SPA (\$)	11 200
AAP (\$)	ND ND

Between Oct 2019 and Nov 2019, your credit limit/high balance was \$11,300

After dispute

BANK OF AMERICA Partial Acct # 440068291605 PO BOX 982238 EL PASO TX 79998 (800) 421-2110

Date opened	First reported	Recent balance	Payment history											
			Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Jan 2006	Oct 2017	Not reported												
Address ID #	Terms	Status												
0740587174	Not reported	Closed.												
Type	Monthly payment	Comment:												
Credit card	Not reported	Account closed at												
Responsibility	Credit limit or original amount	credit grantor's request.												
Individual	\$11,300	This item was updated from our processing of your dispute in Jul 2020.												
	High balance	\$11,368												
	Date of Status	Dec 2019												

Account History * (AB = Account Balance, DPR = Date Payment Received, SPA = Scheduled Payment Amount, AAP = Actual Amount Paid)

Nov19	Oct19
AB (\$)	11 10,006
DPR	Nov14 Oct21
SPA (\$)	11 200
AAP (\$)	ND ND

Between Oct 2019 and Nov 2019, your credit limit/high balance was \$11,300

Before dispute

CITI Partial Acct # 410029017335 PO BOX 6190 SIOUX FALLS SD 57117-6555 378-6467

Date opened	First reported	Recent balance	Payment history											
			Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Dec 2009	Sep 2016	\$3,770 as of Jun 2020												
Address ID #	Terms	Status												
0811125275	Not reported	Account charged off.												
Type	Monthly payment	\$3,845 written off. \$456 past due as of Jun 2020.												
Credit Card	Not reported	This account is scheduled to continue on record until Apr 2025.												
Responsibility	Credit limit or original amount	Comment:												
Individual	\$3,200	Account closed at credit grantor's request.												
	High balance	\$3,845	This item remained unchanged from our processing of your dispute in Apr 2020.											
	Date of Status	Jan 2019												

Account History * (AB = Account Balance, DPR = Date Payment Received, SPA = Scheduled Payment Amount, AAP = Actual Amount Paid)

May20	Apr20	Mar20	Feb20	Jan20	Dec19	Nov19	Oct19	Sep19	Aug19	Jul19	Jun19	May19	Apr19	Mar19
AB (\$)	3,770	3,770	3,770	3,770	3,770	3,770	3,770	3,770	3,770	3,795	3,795	3,820	3,820	3,845
DPR	Jul12	Jun05	Jun05	Mar29	Mar29	Dec13								
SPA (\$)	ND													

MARK JOHN CARLO | Report # 2135-8064-76 for 07/18/20

	Feb19	Jan19	Dec18	Nov18	Oct18	Sep18	Aug18	Jul18
AB (\$)	3,845	3,845	3,780	3,795	3,692	3,600	3,505	3,410
DPR	Dec13	Dec13	Dec13	Apr20	Apr20	Apr20	Apr20	Apr20
SPA (\$)	ND	ND	681	735	619	531	435	332
AAP (\$)	ND							

Between Jul 2018 and May 2020, your credit limit/high balance was \$3,200

If our reinvestigation has not resolved your dispute, you have several options:

You may add a statement of up to 100 words to your report. If you provide a consumer statement that contains medical information related to service providers or medical procedures, then you expressly consent to Experian including this information in every credit report we issue about you. You may contact the company that reports the information to us and dispute it directly with them. If you wish to obtain documentation or written verification concerning your accounts, please contact your creditors directly. You may provide us additional information or documents about your dispute to help us resolve it by visiting www.experian.com/upload. You may also mail your information to Experian, P.O. Box 9701, Allen, Texas 75013. You may file a complaint about Experian or the company reporting the item, with the Consumer Financial Protection Bureau or your State Attorney General's office. If there has been a change to your credit history resulting from our reinvestigation, or if you add a consumer statement, you may request that Experian send an updated report to those who received your report within the last two years for employment purposes, or within the last six months for any other purpose (the past 12 months for residents of Colorado, Maryland or New York), or within the last year for any non-employment purpose under the California Investigative Consumer Reporting Agencies Act. If you send a request to have your results sent to past recipients of your credit report, please designate the organization's name and address. In the event an organization is not specifically designated, we will generally default to sending only to companies that have requested your credit information as a result of an action you took, such as applying for credit, insurance, employment or apartment rental. If you request to have your results sent to past recipients of your investigative consumer report, you have the right to designate which entities you wish to receive the updated report and which entities you do not wish to receive the update. If interested, you may also request a description of how the reinvestigation was conducted along with the business name, address and telephone number (if reasonably available) of the furnisher of information. Thank you for helping ensure the accuracy of your credit information. For frequently asked questions about your credit report, please visit experian.com/consumerfaqs.

Your Updated Credit Report

Payment History Legend

Current	Account 150 days past due	VS Voluntarily surrendered	DOD Defaulted on contract
Account 30 days past due	Account 180 days past due	R Repossession	CG Collection
Account 60 days past due	CRD Creditor received deed	PBC Paid by creditor	CO Charge off
Account 90 days past due	FS Foreclosure proceedings started	EC Insurance claim	CLS Closed
Account 120 days past due	F Foreclosed	G Claim filed with government	ND No data for this time period

*If your creditor reported your account balances to us, we list them in this section as additional information about your account.

Medical Information

By law, we cannot disclose certain medical information (relating to physical, mental, or behavioral health or condition). Although we do not generally collect such information, it could appear in the name of a data furnisher (i.e. "Cancer Center") that reports your payment history to us. If so, those names display on your report, but on reports to others, they display only as MEDICAL PAYMENT DATA. Consumer statements included on your report at your request that contain medical information are disclosed to others.

7172-01 00 0005165-0002-0011580

Your accounts that may be considered negative The most common items in this section are late payments, accounts that have been charged off or sent to collection, and bankruptcies. It also may contain items that are not necessarily negative, but that a potential creditor might want to review more closely, such as an account that has been settled or transferred. This information is generally removed seven years from the initial missed payment that led to the delinquency. Missed payments may remain on the credit report for up to seven years. Chapters 7, 11 and 12 bankruptcies may remain on the credit report for up to 10 years. Transferred accounts that have not been past due remain up to 10 years after the date the account was transferred.

Credit items

BANK OF AMERICA Partial Acct # 440066291605 PO BOX 982238 EL PASO TX 79998 (800) 421 2110

Date opened
 Jan 2006
Address ID #
 0740587174
Type
 Credit card
Responsibility
 Individual

First reported
 Oct 2017
Terms
 Not reported
Monthly payment
 Not reported
Credit limit or original amount
 \$11,300
High balance
 \$11,368

Recent balance
 Not reported
Status
 Closed.
Comment:
 Account closed at credit grantor's request.
 This item was updated from our processing of your dispute in Jul 2020.
Date of Status
 Dec 2019

MARK JOHN CARLO | Report # 2135-8064-76 for 07/18/20

Payment history

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
2019	OK											
2018	OK											
2017												



Account History * (AB = Account Balance, DPR = Date Payment Received, SPA = Scheduled Payment Amount, AAP = Actual Amount Paid)

	Nov19	Oct19
AB (\$)	11	10,066
DPR	Nov14	Oct21
SPA (\$)	11	200
AAP (\$)	ND	ND

Between Oct 2019 and Nov 2019, your credit limit/high balance was \$11,300

KOHLS/CAPONE Partial Acct# 639305045437 PO BOX 3115 MILWAUKEE WI 53201 (800) 564-5740

Date opened
 Dec 2009
Address ID #
 0811125275
Type
 Credit Card
Responsibility
 Individual

First reported
 Sep 2016
Terms
 Not reported
Monthly payment
 Not reported
Credit limit or original amount
 \$3,200
High balance
 \$3,845

Recent balance
 \$3,770 as of Jul 2020
Status
 Account charged off.
 \$3,845 written off. \$513 past due as of Jul 2020.
Comment:
 This account is scheduled to continue on record until Apr 2025.
 Account closed at credit grantor's request.
 This item remained unchanged from our processing of your dispute in Jul 2020.
Date of Status
 Jan 2019

Payment history

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
2020	OK											
2019	OK											
2018	OK											
2017												
2016												

Account History * (AB = Account Balance, DPR = Date Payment Received, SPA = Scheduled Payment Amount, AAP = Actual Amount Paid)

	Jun20	May20	Apr20	Mar20	Feb20	Jan20	Dec19	Nov19	Oct19	Sep19	Aug19	Jul19	Jun19	May19	Apr19
AB (\$)	3,770	3,770	3,770	3,770	3,770	3,770	3,770	3,770	3,770	3,770	3,770	3,705	3,705	3,820	3,820
DPR	Jul12	Jun25	Jun25	Mar29	Mar29										
SPA (\$)	ND														
AAP (\$)	ND														
	Mar19	Feb19	Jan19	Dec18	Nov18	Oct18	Sep18	Aug18	Jul18						
AB (\$)	3,845	3,845	3,845	3,780	3,795	3,692	3,600	3,505	3,410						
DPR	Dec13	Dec13	Dec13	Dec13	Apr20	Apr20	Apr20	Apr20	Apr20						
SPA (\$)	ND	ND	ND	681	735	619	531	435	332						

7172-01-00-0002165-0002-0011500

Your accounts in good standing These items may stay on your credit report for as long as they are open. Once an account is closed or paid off it may continue to appear on your report for up to ten years. Each of the items in this section has a positive payment history, meaning that no delinquencies or derogatory statuses are reported in the displayable payment history.

KOHLS/CAPONE Partial Acct# 639305045437 PO BOX 3115 MILWAUKEE WI 53201 (800) 564-5740

*** 408625625-009 ***

TransUnion LLC
PO Box 805
Woodlyn, PA 19094-0805



07/14/2020



PCGZVL00202547-1033037-072187985
[REDACTED]
MARK JOHN CARLO

The mailing address listed above has been modified based on the USPS National Change of Address database. It may not be part of your TransUnion credit report.

Dear MARK JOHN CARLO,

We understand that recently something on your credit report did not seem right to you. We take this matter seriously, and we want to make sure your TransUnion credit report is accurate. It's our commitment to you.

Our investigation of the dispute you submitted is now complete. After a review of your dispute and any provided documentation, we took one or more of the following action(s):

1. Updated your credit report based on the information you provided; OR
2. Determined that the information you disputed either does not appear on your credit file or already shows the requested status; OR
3. Determined that the data furnisher had previously verified the reported information. If any of the items you disputed were previously verified, a separate communication was sent to you listing those items along with the data furnisher's contact information; OR
4. Asked the data furnisher reporting the information you disputed to do all of the following:
 - Review relevant information we sent them, including any provided documents
 - Investigate your dispute and verify whether the information they report is accurate
 - Provide us a response to your dispute and update any other information
 - Update their records and systems, if necessary;

Your dispute is important. In the pages that follow, you will see your detailed investigation results, including the name and contact details of the source of the information. Please review the results carefully. To view a full copy of your credit report and for more information about how to read your credit report, please visit www.transunion.com/fullreport.

How to Read Your Investigation Results

You will see that, for each disputed item, a summary explanation appears in the gray box, followed by a brief paragraph describing the results of our investigation, followed by a view of how the item appears in your updated credit report. Please note any changes we made to personal information (name, address, employment, SSN, date of birth) will appear at the end of Your Investigation Results.

File Number: 408625826
 Date Issued: 07/14/2020

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INVESTIGATION RESULTS - VERIFIED AS ACCURATE AND UPDATED: The disputed item(s) was verified as accurate; however, other information has also changed.

BANK OF AMERICA #440066291805* (PO BOX 982238, EL PASO, TX 79999-2236, (800) 421-2110)**

We investigated the information you disputed and the disputed information was **VERIFIED AS ACCURATE**; however, we updated: **Date Updated; Past Due; Rating**. Here is how this account appears on your credit report following our investigation.

Date Opened:	01/20/2008	Balance:	\$0	Pay Status:	Current: Paid or Paying as Agreed
Responsibility:	Individual Account	Date Updated:	12/24/2019	Terms:	Paid Monthly
Account Type:	Revolving Account	Last Payment Made:	12/11/2019	Date Closed:	12/23/2017
Loan Type:	CREDIT CARD	High Balance:	\$11,368	Date Paid:	12/11/2019
		Credit Limit:	\$11,300	>Maximum Definquency of 120 days in 09/2018 and in 04/2019<	

Remarks: CLOSED BY CREDIT GRANTOR: CLOSED

	11/2019	10/2019	09/2019	08/2019	07/2019	06/2019	05/2019	04/2019	03/2019	02/2019	01/2019	12/2018
Rating	OK											
	11/2018	10/2018	09/2018	08/2018	07/2018	06/2018	05/2018	04/2018	03/2018	02/2018	01/2018	12/2017
Rating	OK											
	11/2017	10/2017										
Rating	OK	OK										

*** 408625625-020 ***

TransUnion LLC
PO Box 805
Woodlyn, PA 19094-0805



10/15/2020



Information for Good.

PCY03L00300145-I002305-074985887



MARK JOHN CARLO

10/15/2020

Dear MARK JOHN CARLO,

We understand that recently something on your credit report did not seem right to you. We take this matter seriously, and we want to make sure your TransUnion credit report is accurate. It's our commitment to you.

Our investigation of the dispute you submitted is now complete. After a review of your dispute and any provided documentation, we took one or more of the following action(s):

1. Updated your credit report based on the information you provided; OR
2. Determined that the information you disputed either does not appear on your credit file or already shows the requested status; OR
3. Determined that the data furnisher had previously verified the reported information. If any of the items you disputed were previously verified, a separate communication was sent to you listing those items along with the data furnisher's contact information; OR
4. Asked the data furnisher reporting the information you disputed to do all of the following:
 - Review relevant information we sent them, including any provided documents
 - Investigate your dispute and verify whether the information they report is accurate
 - Provide us a response to your dispute and update any other information
 - Update their records and systems, if necessary;

Your dispute is important. In the pages that follow, you will see your detailed investigation results, including the name and contact details of the source of the information. Please review the results carefully. To view a full copy of your credit report and for more information about how to read your credit report, please visit www.transunion.com/fullreport.

How to Read Your Investigation Results

You will see that, for each disputed item, a summary explanation appears in the gray box, followed by a brief paragraph describing the results of our investigation, followed by a view of how the item appears in your updated credit report. Please note any changes we made to personal information (name, address, employment, SSN, date of birth) will appear at the end of Your Investigation Results.

File Number: 408625625
 Date issued: 10/15/2020

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INVESTIGATION RESULTS - VERIFIED AS ACCURATE: The disputed item was verified as accurate.

BANK OF AMERICA #440066291605* (PO BOX 982238, EL PASO, TX 79998-2235, (800) 421-2110)**

We Investigated the information you disputed and the disputed information was **VERIFIED AS ACCURATE**.

Here is how this item appears on your credit report following our investigation.

Date Opened:	01/20/2006	Balance:	\$0	Pay Status:	Current; Paid or Paying as Agreed
Responsibility:	Individual Account	Date Updated:	12/24/2019	Terms:	Paid Monthly
Account Type:	Revolving Account	Last Payment Made:	12/11/2019	Date Closed:	12/23/2017
Loan Type:	CREDIT CARD	High Balance:	\$11,368	Date Paid:	12/11/2019
		Credit Limit:	\$11,300	>Maximum Delinquency of 120 days in 09/2018 and in 04/2019<	

Remarks: CLOSED BY CREDIT GRANTOR: CLOSED

	11/2019	10/2019	09/2019	08/2019	07/2019	06/2019	05/2019	04/2019	03/2019	02/2019	01/2019	12/2018
Rating	OK	[-30]	[-30]	OK	OK	OK	OK	[-120]	[-120]	[-120]	[-120]	[-120]
	11/2018	10/2018	09/2018	08/2018	07/2018	06/2018	05/2018	04/2018	03/2018	02/2018	01/2018	12/2017
Rating	[-120]	[-120]	[-120]	[-30]	[-60]	[-30]	OK	OK	OK	[-30]	[-60]	[-60]
	11/2017	10/2017										
Rating	[-30]	OK										
